

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

JOHN SULLIVAN,
DEFENDANT.

Criminal No. 23-cr-10039-DJC

**ASSENTED-TO MOTION FOR AN EXTENSION OF TIME TO RESPOND
TO DEFENDANT’S MOTION FOR COMPASSIONATE RELEASE**

The government respectfully submits this motion requesting an extension of time to respond to the Defendant's Motion To Reduce Sentence Pursuant To 18 U.S.C. § 3582(c)(1)(A)(i) Compassionate Release.

The defendant filed the instant motion on December 20, 2024. The Assistant United States Attorney who has been primarily responsible for this matter is currently attending to a family member with a serious illness and is unavailable.

Undersigned counsel has appeared in this case and will prepare a response to defendant's motion. The government recognizes the time-sensitive issues posed by the defendant's motion. However, to permit adequate time to review the background facts of this case and the issues presented by the instant motion, and to adequately prepare a response, the government requests a brief extension of time to file its response until January 10, 2025.

Counsel for the government has conferred with defendant's counsel and the defendant assents to the requested relief.

Respectfully submitted,

UNITED STATES OF AMERICA,

By its attorney,

JOSHUA S. LEVY
United States Attorney

Dated: December 27, 2024

/s/ Christopher Looney
Christopher Looney
Assistant United States Attorney

CERTIFICATE OF SERVICE

Undersigned counsel certifies that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Christopher Looney
Christopher Looney
Assistant United States Attorney

Dated: December 27, 2024